



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII, MONTANA OFFICE
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July 2, 1996

Mr. David D. Swogger, Area Manager
Bureau of Land Management
Big Dry Resource Area
Miles City Plaza
Miles City, Montana 59301-2844

Re: Calypso Trail Supplement
to the Big Dry Resource
Management Plan & EIS

Dear Mr. Swogger:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency, Region VIII, Montana Office (EPA) has reviewed the above-referenced Supplement to the Big Dry Resource Management Plan and Environmental Impact Statement (Supplement).

The Bureau of Land Management Big Dry Resource Area of Miles City District has conducted further planning and now determined that the Calypso Trail, which separates two roadless areas that make up the Terry Badlands Wilderness Study Area, shall be left open to motorized vehicles. The Supplement changes the decision in the Big Dry Resource Management Plan and Final EIS that had recommended closure of the Calypso Trail to motorized access.

The rationale identified in the Supplement for the change in motor vehicle access is that the trail currently receives minimal use and is well screened so that motor vehicle access is not a significant infringement on the naturalness of the northern portion of the Terry Badlands Wilderness Study Area.

There are many statements in the Public Participation section of the Supplement, however, that seem to indicate that the public uses the trail quite a bit. The Supplement also states that the trail is currently used for hunting, hiking, sight-seeing and rancher access for maintenance. This seems to at least partially bring into question the conclusion in the Supplement that the trail receives minimal use. The Supplement also indicates that the trail's silt loam and clay loam soils experience a high amount of erosion resulting in tunneling, channeling and sink holes on and along the trail. Isn't there a relationship between the high amount of erosion on this trail and motor vehicle use?

It would appear that the long term public interest of protection of the Terry Badlands Wilderness Study area is not best served by leaving the trail open to unlimited motor vehicle access. We believe such unlimited motor vehicle use will aggravate the high amount of erosion already experienced on the trail.

We also recognize that certain members of the public would not be able to have access to and enjoyment of these public lands without some motorized access (e.g., elderly, handicapped). It would appear that some accommodation could be made to allow limited motorized access for such people without leaving the trail open to unlimited motorized access likely to exacerbate the erosion problem (i.e., ATVs, dirt bikes).

We believe there are additional options and alternatives beyond those considered in the Supplement that should be analyzed and considered by the BLM that may better balance the interests of the public seeking motorized access vs. the interests of the public seeking to preserve the naturalness of the area and reduce erosion along the trail.

Could an alternative be considered that would limit motor vehicle access, but provide access to vehicles with senior citizen and the handicapped? Could access of ATVs and motorcycles, that are more likely to drive off the trail and exacerbate erosion problems, be restricted? Could a permit system to control or limit the numbers of motor vehicles using the trail be considered? Could the BLM or a contractor provide regularly scheduled van trips along the trail to allow the public that is not willing or able to hike or ride horses along the trail at least have some access to the area (thus limiting the numbers of vehicles using the trail).

We also believe that the standards and criteria to be used by the BLM to evaluate and quantify trail erosion and impacts to the Wilderness Study Area during monthly monitoring should be identified. This will allow the public to better understand the basis upon which future trail access decisions will be made. This in turn may lead to improved public acceptance of potential future access limitations. We recommend that BLM staff carrying out monthly monitoring make erosion measurements and take color photos at fixed reference points on a regular basis to monitor and document the condition of the trail and adjacent areas through time.

We will appreciate your consideration of these comments. If you have any questions or would like to discuss these matters further please contact Mr. Steve Potts of my staff at (406) 441-1140 ext. 232.

We thank you for the opportunity to comment.

Sincerely,

Robert L. Ford
John F. Wardell
Director
Montana Office

cc: Carol Campbell, 8EPR-EP, Denver
Glenn Carpenter, BLM District Manager, Miles City
Larry Hamilton, BLM State Director, Billings
John Thompson, BLM NEPA Coordinator, Billings